# IN THE UNITED STATES BANKRUPCTY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§	
	§	Case No. 22-31641-mv-7
GOODMAN NETWORKS, INC.	§	
	§	(Chapter 7)
Debtor.	§	· -
	§	
SCOTT M. SIEDEL, TRUSTEE; GNET	§	
ATC, LLC; MULTIBAND FIELD	§	
SERVICES, INC.	§	ADVERSARY PROCEEDING
	§	NO: 23-03036-mvl
Plaintiff(s),	§	
	§	
V.	§	
	§	
JAMES FRINZI; FRINZI FAMILY TRUST,	§	
MULTIBAND GLOBAL RESOURCES,	§	
LLC,	§	
•	Š	
Defendant(s).	§	

## <u>UNOPPOSED MOTION TO WITHDRAW AS COUNSEL OF RECORD</u>

Wick Phillips Gould & Martin, LLP ("<u>WPGM</u>") files this Unopposed Motion to Withdraw as Counsel (the "<u>Motion</u>") for Defendants James Frinzi, Frinzi Family Trust, and Multiband Global Resources, LLC ("<u>Defendants</u>").

- 1. WPGM seeks to withdraw from representing Defendants in this case. WPGM is owed substantial fees under its engagement letter.
- 2. Pursuant to Local Bankruptcy Rule 2091-1, Defendants agree to WPGM's withdrawal and executed this Motion below. Defendants have not retained successor counsel and the contact information is as follows:
  - a. Name: Mr. James Frinzi
  - b. Address: 3736 Bee Cave Road, Suite 1164 Austin, Texas 78746

- c. Telephone Number: (202) 430-4500
- 3. This request to withdraw is not made for purposes of delay.

WHEREFORE, WPGM respectfully requests this Court to (i) grant the Motion (ii) enter the proposed order attached as **Exhibit A** to permit WPGM to withdraw as counsel to Defendants (iii) and grant WPGM such other and further relief to which it may be justly entitled, both at law and equity.

Executed:

James Frinzi, individually, and as Trustee of Frinzi Family Trust, and as

Manager of Multiband Global Resources, LLC

Dated: April 23, 2024 Respectfully submitted,

#### /s/ Jason M. Rudd

Jason M. Rudd, Tex. Bar No. 24028786 Paul T. Elkins, Tex. Bar No. 24092383 WICK PHILLIPS GOULD & MARTIN, LLP 3131 McKinney Avenue, Suite 500 Dallas, TX 75204

Phone: (214) 692-6200 Fax: (214) 692-6255

Email: jason.rudd@wickphillips.com paul.elkins@wickphillips.com

COUNSEL FOR DEFENDANTS JAMES FRINZI, FRINZI FAMILY TRUST, AND MULTIBAND GLOBAL RESOURCES, LLC

### **CERTIFICATE OF CONFERENCE**

Local Bankruptcy Rule 7007-1, I hereby certify that on April 18, 2024, I conferred by phone with Davor Rukavina, Counsel for Scott Seidel, Chapter 7 Trustee and Plaintiff. The Trustee does not oppose this Motion.

/s/ Jason M. Rudd

Jason M. Rudd

# **CERTIFICATE OF SERVICE**

I hereby certify that on April 23, 2024, I electronically filed the foregoing with the clerk of the court using the CM/ECF system and have served a copy of the same to the following parties or their counsel via the method(s) indicated below:

Davor Rukavina		
Thomas D. Berghman		Hand Delivery
MUNSCH HARDT KOPF & HARR, P.C.		Regular Mail
3800 Ross Tower		Facsimile
500 N. Akard Street		E-mail
Dallas, TX 75201	X	CM/ECF
Counsel for the Scott Seidel, Chapter 7 Trustee		
James Frinzi, Individually,		Hand Delivery
Trustee of the Frinzi Family Trust, and as	X	Regular Mail
Manager of Multiband Global Resources, LLC		Facsimile
3736 Bee Cave Road, Suite 1164	X	E-mail
Austin, Texas 78746		CM/ECF
James@frinzi.net		
/s/ Jason	M Rudd	
	111. 111111111	

Case 23-03036-mvl Doc 67 Filed 04/23/24 Entered 04/23/24 16:03:18 Desc Main Document Page 4 of 6

EXHIBIT A
Proposed Order

## IN THE UNITED STATES BANKRUPCTY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§	
	§	Case No. 22-31641-mv-7
GOODMAN NETWORKS, INC.	§	
,	§	(Chapter 7)
Debtor.	§	
	§	
SCOTT M. SIEDEL, TRUSTEE; GNET	§	
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SERVICES, INC.	§	ADVERSARY PROCEEDING
	8	NO: 23-03036-mvl
Plaintiff(s),	§	
	§	
V.	§	
	§	
JAMES FRINZI; FRINZI FAMILY TRUST,	§	
MULTIBAND GLOBAL RESOURCES,	§	
LLC,	§	
	§	
Defendant(s).	§	

## ORDER GRANTING UNOPPOSED MOTION TO WITHDRAW AS COUNSEL OF RECORD

Came on consideration the Unopposed Motion to Withdraw as Counsel, filed by Wick Phillips Gould & Martin, LLP ("WPGM"), in the above-captioned case. The Court, having jurisdiction to consider the Motion and relief requested therein, finds that proper notice of the Motion has been provided and good cause exists to permit WPGM to withdraw as counsel for

Case 23-03036-mvl Doc 67 Filed 04/23/24 Entered 04/23/24 16:03:18 Desc Main Document Page 6 of 6

Defendants James Frinzi, Frinzi Family Trust, and Multiband Global Resources, LLC ("Defendants"). Therefore, it is hereby:

ORDERED that the Motion is GRANTED; it is further

ORDERED that the Clerk of this Court and all parties are directed to remove WPGM as counsel for Defendants on the docket and any applicable service list, including the Court's CM/ECF electronic notification list, maintained in the Bankruptcy Case.

ORDERED Mr. Frinzi may be contacted as follows: 3736 Bee Cave Road, Suite 1164 Austin, Texas 78746, James@frinzi.net.

### END OF ORDER ###

#### PREPARED AND SUBMITTED BY:

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